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Submitted via email to: [designwa@dplh.wa.gov.au](mailto:designwa@dplh.wa.gov.au)  
Department of Planning, Land and Heritage  
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## Submission: Draft Safer Places by Design, Crime Prevention through Environmental Design Planning Guidelines

Congratulations on the preparation of the Draft Safer Places by Design, Crime Prevention through Environmental Design Planning (CEPTED) Guidelines (the guidelines). The Committee for Perth believes that the draft guidelines are a step forward in the proactive management of safety in urban spaces in Western Australia.

In our role as a think tank and advocate for a positive future for Greater Perth, we are cognisant that safety and perceptions of safety play a vital role in the liveability of urban areas and in our collective social, cultural and economic wellbeing. In this context, our research has made us sharply aware that the Greater Perth community has had growing concerns about safety in our city and suburbs in recent years and that safety and security has become a high priority issue for some local authorities such as the City of Perth.

This submission has been prepared with assistance from the Committee's Reshaping Working Group and has been informed through a presentation to the Working Group from representatives from the Department of Planning, Lands and Heritage.

### **Strategic Application**

The Committee understands that consideration of the guidelines is triggered through the development process and specific types of planning and development proposals which are required to consider State Planning Policy 7, Design of the Built Environment; and State Planning Policy 7.2, Precinct Design through the design, review and assessment.

The Committee for Perth supports this requirement however we also note that there could be some existing crime hot spots that would benefit from a retrospective CPTED design review and we encourage the Department to work with other government agencies and entities to identify opportunities for broader, more strategic application of the guidance.

### **State and Local Consistency**

There is some concern among our members that the existence of both state and local CPTED guidance means that there can be multiple layers of guidance that designers and developers need to consider as part of a project, and these do not always align. For example, some local authority guidelines require the provision of CCTV, while the draft guidelines identify CCTV as a secondary response.

There is also concern that some current local guidelines are resulting in outcomes that are not site responsive or are inappropriate for local conditions. We believe that the effectiveness of the guidelines would be heightened if there was a requirement for local CPTED requirements to be consistent with state guidance, particularly given the aim of the guidelines to facilitate site appropriate responses.

### **Vulnerable/High Risk Locations**

While the guidelines are clear that active surveillance should be incorporated into the design of places that could be high risk terrorist targets, the guide is less clear about the types of locations that would qualify as 'higher risk or vulnerable'. It is the view of the Committee that technologies like CCTV are important tools that should be used in all locations that have been identified as or have the potential to become hot spots for crime at any time during the day or night.

Consideration could also be given to heightened surveillance in places that attract disproportionately numbers of vulnerable people such as children, the elderly, women or minority groups.

### **Technology**

The Committee for Perth supports the use of new technologies to improve the safety of places and spaces however we are also aware that the implementation of these types of technologies can have unforeseen negative impacts and teething problems. For example, the potential drawbacks of facial recognition technology include threats to privacy, violations of rights and personal freedoms, potential data theft, and flaws in the technology which include inequality in facial recognition algorithms. It is therefore important for the State Government to play a leadership role in the review of new technologies and the existing regulatory framework to identify and address potential barriers or problems associated with the implementation of these new technologies.

### **Collaboration with WA Police**

The importance of collaborating with the WA Police Force in finalising and implementing the guidelines has been highlighted by Committee for Perth members. Specifically members have identified access to local crime data as an issue that could hinder implementation and that will require police support and co-operation. Opportunities have also been identified for WA Police to champion CPTED initiatives through broader initiative, similar to the Secured by Design (<https://www.securedbydesign.com/>) program in the United Kingdom, as well as by funding an awards program and extending design guidance.

### **Compliance and Evaluation**

To ensure effective outcomes, Committee for Perth members have highlighted the importance of ensuring that the implementation of the guidelines incorporates a program for compliance monitoring and for longer term outcomes evaluation. Compliance monitoring is required to ensure that the CPTED features and initiatives proposed and approved during the design and approval phase of a project are fully implemented during the development and operation phase. A longer term evaluation program is also important to enable DPLH and WAPC to monitor the effectiveness of the guidelines in delivering safer places.

Yours sincerely,



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